

THE LAW OFFICES OF  
**J O S E P H A. B O N D Y**

**JOSEPH A. BONDY**

**STEPHANIE R. SCHUMAN**  
(OF COUNSEL)

**1776 BROADWAY**  
**SUITE 2000**  
**NEW YORK NY 10019**  
**TEL 212.219.3572**  
**FAX 212.219.8456**

[JOSEPHBONDY@MAC.COM](mailto:JOSEPHBONDY@MAC.COM)

July 23, 2020

Hon. J. Paul Oetken  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
Courtroom 706  
New York, NY 10007

Re: United States v. Lev Parnas, et. al., 19-cr-725 (JPO)

Dear Judge Oetken:

Earlier this week, Mr. Parnas's wife broke her fibula (calf bone) while playing with their children. She is scheduled to see an orthopedic surgeon tomorrow, and will be incapacitated for a significant but yet-to-be determined period. Mr. Parnas's assistance outside of the home is essential.

We therefore request modification of the terms of Mr. Parnas's pre-trial release, from strict home confinement to a curfew that will allow Mr. Parnas to be out of his home between 7 a.m. and 7 p.m., subject to the limitations set forth below:

- (1) Travel restricted within Palm Beach County, Florida, but not into an exclusion zone around the airport;
- (2) Leaving home only for grocery shopping, child care, dog walking, purchasing household necessities, and taking Svetlana Parnas to medical appointments. If Mr. Parnas wishes to leave his house for other reasons it must be approved by his supervising officer in advance;
- (3) These modified conditions will only apply while Svetlana Parnas recovers from her injury, and Mr. Parnas will return to his prior conditions once he is recovered.

I have communicated AUSAs Nicolas Roos, Rebekah Donaleski and Douglas Zolkind, and USPTOs Joshua Rothman (SDNY) and Rick Samson (SDFL). *Neither the Government nor Pre-Trial Services opposes this request, subject to the above limitations.*

Thank you for consideration of this application.

Respectfully submitted,

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Joseph A. Bondy  
*Counsel to Lev Parnas*